

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

QUEEN TIERA R. MILLER,

) CASE NO.: 1:19-CV-01080

Plaintiff,

) JUDGE: DONALD C. NUGENT

- vs -

) **JOINT STIPULATIONS OF FACT**

)

CITY OF SHAKER HEIGHTS, OHIO, et al., )

Defendants. )

---

1. On September 21, 2018, Ms. Miller was riding in the passenger seat of her vehicle through the City of Shaker Heights, Ohio.
2. Ms. Miller owned the vehicle which was driven by a female friend.
3. At about 2:15 a.m., the vehicle Ms. Miller was riding in was pulled over by Defendant Tyler Smith (“Smith”), a police officer employed by Defendant City of Shaker Heights.
4. Soon after Officer Smith pulled the vehicle over, Shaker Heights Police Officer B. Meredith arrived to back up Officer Smith.
5. Although Ms. Miller was a passenger, Officer Smith learned Ms. Miller had a suspended license.
6. At about 2:29 a.m., Ms. Miller was issued a citation by Officer Smith for the crime of wrongful entrustment of the vehicle to the driver.

7. Ms. Miller was asked to write her telephone number on the ticket and then was required to sign the ticket evidencing receipt.
8. On September 21, 2018, after officer Smith got off duty, Ms. Miller met Officer Smith at the Landmark Restaurant for breakfast.
9. On September 21, 2018, Ms. Miller and Officer Smith had sex.
10. Ms. Miller met officer Smith around October 18, 2018 at Starbucks and received money from Officer Smith.

*s/ Avery Friedman*

---

Avery Friedman  
Avery Friedman & Associates  
701 The City Club Building  
850 Euclid Avenue  
Cleveland, OH 44114  
avery@lawfriedman.com  
fairhousing@gmail.com

*Counsel for Plaintiff*

*s/ Jared S. Klebanow*

---

Jared S. Klebanow  
Klebanow Law, LLC  
701 The City Club Building  
850 Euclid Avenue  
Cleveland, OH 44114  
jklebanow@klebanowlaw.com

*Counsel for Plaintiff*

*s/ John T. Mclandrich*

---

John T. Mclandrich  
Terence L. Williams  
Christina M. Nicholas  
Mazanec, Raskin & Ryder Co., L.P.A.  
100 Franklin's Row; 34305 Solon Road  
Cleveland, OH 44139  
jmclandrich@mrrlaw.com  
twilliams@mrrlaw.com  
cnicholas@mrrlaw.com

*Counsel for Defendant Tyler Smith*